

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.; and)
HONEYWELL INTELLECTUAL PROPERTIES)
INC.,) C.A. No. 04-1338 (KAJ)
)
Plaintiffs,) CONSOLIDATED
)
v.)
)
APPLE COMPUTER, INC., et al.,)
)
Defendants.)

**NOTICE OF TAKING DEPOSITION OF
RULE 30(b)(6) DESIGNEE OF DEFENDANT SONY CORPORATION**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure and this Court's Order of May 5, 2006, Plaintiffs Honeywell International Inc. and Honeywell Intellectual Properties Inc. (collectively "Honeywell") will take the deposition of Sony Corporation. The deposition will be taken on June 29, 2006, beginning at 9:00 a.m. (local time) and will be taken at the office of Morris, Nichols, Arsh & Tunnell LLP, Chase Manhattan Centre, 18th Floor, 1201 N. Market Street, Wilmington, DE 19899-1347, or at such other date, time or location to which the parties may stipulate. The deposition will continue from day to day and shall be taken before any officer qualified to administer oaths under the Federal Rules of Civil Procedure. The deposition will be recorded stenographically and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), you are to designate one or more officers, directors, or managing agents, or persons who consent to testify on behalf of Sony Corporation regarding the following subjects, which should be interpreted broadly, and with

application of the definitions and instructions included in Plaintiffs' First Set of Document Requests to Sony Corp. and Plaintiffs' First Set of Interrogatories to Sony.

1. The formation, structure and corporate governance of ST-LCD, including any relationships between Sony and ST-LCD.
2. Sony's media, communications, or public relations efforts, that in any way relate to, implicate, or mention ST-LCD.
3. Sony's input, direction and guidance over what ST-LCD manufactures and ST-LCD's production timeline.
4. Sony's marketing strategies for LCD modules, including whether ST-LCD contributes in any way to Sony's marketing campaigns.
5. Sony's sales and distribution of Sony products containing ST-LCD's modules in the United States and Delaware, as well as sales to "big box" retailers such as Best Buy, Circuit City, and CompUSA.
6. Sony's communications with ST-LCD or anyone employed by ST-LCD regarding the sales and distribution of Sony products containing ST-LCD's modules.
7. Sony's communications with ST-LCD or anyone employed by ST-LCD regarding the sales and distribution of third-party products containing ST-LCD's modules.
8. The existence and terms of all Indemnification agreements among the Sony entities covering or related to ST-LCD's products.
9. The facts and circumstances underlying Mr. Robert L. Hails' representation in his October 28, 2005 letter to Matthew L. Woods, counsel for Honeywell, "with respect to the case against the manufacturers of the allegedly infringing LCD modules, Sony Corp. will stand in for ST-LCD."
10. The facts and circumstances underlying Mr. Robert L. Hails' representation in the May 4, 2006 hearing before this Court that with respect to ST-LCD, "[i]t's a joint venture formed by combination between Sony Corporation and the Toyota entity. And there is no doubt that there is a cooperative relationship between them," and "I would think that Delaware's interest in holding jurisdiction over ST-LCD . . . is ameliorated by the fact there are intermediaries that are ready and can satisfy any judgment that occurs."

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ *Leslie A. Polizoti*

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May 26, 2006
522345

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following:

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I also certify that on May 26, 2006, I caused to be served true and correct copies of the foregoing on the following as indicated:

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